

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION**

**THIS DOCUMENT RELATES TO:  
ALL ACTIONS**

**MDL NO. 2724  
16-MD-2724**

**HON. CYNTHIA M. RUFÉ**

**DEFENDANTS' STATUS REPORT**

Pursuant to Pretrial Order No. 13 (MDL Dkt. No. 196), Defendants hereby submit the enclosed status report setting forth suggestions for the management of the MDL. For ease of reference, Defendants have divided the status report into five sections, corresponding with the agenda submitted by the parties on April 20, 2017.

- I. REPORT ON STATUS OF CASES TRANSFERRED INTO THE MDL AND POTENTIAL TAG-ALONGS**
- II. DOCKETING AND ADMINISTRATION OF MDL**
- III. SCHEDULING AND MANAGEMENT OF CASES**
- IV. GOVERNING PROTOCOLS – PROTECTIVE ORDER, ESI PROTOCOL, AND PRESERVATION ORDER**
- V. LEADERSHIP AND LIAISON COUNSEL**

**I. REPORT ON STATUS OF CASES TRANSFERRED INTO THE MDL AND POTENTIAL TAG-ALONGS**

Defendants and Plaintiffs have conferred and Defendants incorporate Section I of Plaintiffs' status report herein, which includes a chart of cases transferred into the MDL and potential tag-alongs.

**II. DOCKETING AND ADMINISTRATION OF MDL**

Defendants have conferred with Plaintiffs regarding certain docketing and filing procedures for various different cases that comprise this MDL. Defendants agree that No. 16-MD-2724 be maintained as the master docket in this MDL and that separate docket numbers be created underneath the master docket number for each generic pharmaceutical case. Defendants also agree that there should be “. . . a system for identifying filings that apply only to DPP, EPP, or IRP cases[.]” (Plaintiffs' Status Report, Section II n.1.) For clarity and to avoid confusion, Defendants believe that within each individual generic pharmaceutical docket, there should be a sub-docket for each Plaintiff class (i.e., DPPs, EPPs, and IRPs). Each filing would therefore contain a caption listing the master docket, the generic pharmaceutical and docket number, and the sub-file docket number specifying which plaintiff actions to which that filing is applicable. Defendants agree with Plaintiffs “that the structure of the dockets should be established based on the preferences of the Clerk of Court working in conjunction with all Parties.” (*Id.*)<sup>1</sup>

**III. SCHEDULING AND MANAGEMENT OF CASES**

Defendants submit that the following scheduling and case management processes and procedures should be implemented across all actions.

---

<sup>1</sup> The Proposed Pretrial Order Plaintiffs attached to Section II of Plaintiffs' status report is acceptable to Defendants, except that it should include sub-file docket numbers specifying which plaintiff actions to which that filing is applicable.

**A. Consolidated Amended Complaints**

Defendants propose that once Lead Plaintiffs' Counsel have been appointed, Plaintiffs in all cases must file Consolidated Amended Complaints so that there are no longer any overlapping/conflicting class action complaints pending.<sup>2</sup> Based on the complaints filed to date, Defendants propose that a single Direct Purchaser Consolidated Class Action Complaint and a single End Payor Consolidated Class Action Complaint should be filed for each of the individual drugs that are the subject of the pending complaints. This procedure will avoid unnecessary duplication, inconvenience and confusion caused by having multiple, overlapping complaints on behalf of the same putative classes of purchasers of the same drug. Defendants propose that Consolidated Amended Complaints be required to be filed within 30 days of the appointment of Lead Plaintiffs' Counsel.

**B. Responsive Pleadings and Motions To Dismiss**

Defendants further propose that the scheduling of responsive pleadings and motions to dismiss in all cases should be done in the most efficient way so that the Court is not deciding motions to dismiss in all of these cases at the same time. To ensure that the Court and the parties can devote the necessary time and attention to each of these important motions, Defendants suggest that motions proceed with respect to an initial, limited number of cases to be identified after Lead Plaintiffs' Counsel have been appointed. After rulings on motions in this initial group of cases, a schedule and process would be set for filing motions to dismiss in the remaining cases.

---

<sup>2</sup> Rouses Point Pharmaceuticals, LLC ("Rouses Point") opposes the consolidation of complaints in the Propranolol actions. Rouses Point is named as a defendant, with no specific facts pleaded against it, in only two of seven End Payor Propranolol actions, and has not been named in the three Direct Purchaser Propranolol actions, or any other product case. It should not reflexively be added to a much broader consolidated complaint. (*See* Pretrial Order No. 1, para 2.B.)

Subject to the Court's agreement with this approach, Defendants propose that counsel, within 10 business days of appointment of Lead Plaintiffs' Counsel, confer and submit a proposed schedule (or schedules if agreement cannot be reached by all parties) for the filing and briefing of motions to dismiss in an initial set of cases, consistent with the approach of grouping as discussed above.

The Propranolol Defendants recognize that their cases are somewhat differently situated in light of the motions to dismiss that were decided in the Propranolol cases pending in the Southern District of New York before Judge Rakoff, on the same day that the JPML transferred those cases to this Court. Assuming that Plaintiffs will be required to file new consolidated complaints, and because Judge Rakoff's decision relied on Second Circuit law (indeed, Judge Rakoff explicitly declined to follow Third Circuit authority), and that the decision was issued *after* the JPML issued its order centralizing the Propranolol cases in this Court, Defendants in those cases respectfully request that the Court allow renewed briefing on a motion to dismiss under Third Circuit law.

**C. Case Management After Responsive Pleadings and Motions to Dismiss**

Defendants submit that there should be no discovery with respect to any given action pending resolution of a motion to dismiss that action. The United States Supreme Court recognized in its seminal *Twombly* decision the extraordinary discovery burdens placed upon defendants in antitrust cases, and the need for courts to carefully scrutinize antitrust complaints at the motion to dismiss stage. Until this Court determines that a Plaintiff is entitled to impose those heavy burdens and expenses in a particular case, Defendants submit that discovery is not appropriate. It is premature to establish a full discovery and case management schedule for this MDL or any case within it until the Court rules on a motion to dismiss.

#### **IV. GOVERNING PROTOCOLS – PROTECTIVE ORDER, ESI PROTOCOL, AND PRESERVATION ORDER**

To promote the efficiencies sought by the JPML, Defendants propose that each case should be governed by separate -- but substantively identical -- ESI Protocols, Document Preservation Orders and Protective Orders (collectively, “Document Production Orders”), which would be captioned in each of the different cases.<sup>3</sup>

These substantively identical Document Production Orders across the cases will avoid unnecessary expense and confusion.<sup>4</sup> Numerous Plaintiffs and Defendants are parties in multiple actions involving different drugs. Accordingly, having a single, standard document production process across all cases will simplify document review and production, and ensure that different and potentially conflicting obligations and processes are not imposed on these parties.

To achieve this objective, Defendants propose that within 14 business days of the appointment of Lead Plaintiffs’ Counsel for the different cases, the parties shall meet and confer to discuss the terms of Document Production Orders. Upon conclusion of those discussions, the parties shall submit, through Liaison Counsel, for the Court’s consideration either: (1) joint proposed Document Production Orders; or (2) competing proposed Document Production Orders, along with short submissions setting forth their positions.

#### **V. LEADERSHIP AND LIAISON COUNSEL**

In accordance with Paragraph 4.A of Pretrial Order No. 1 (ECF No. 2), Pretrial Order No. 3 (ECF No. 37), the Transfer Order of the United States Judicial Panel on Multidistrict Litigation

---

<sup>3</sup> Separate orders are required because the various cases have different plaintiffs and defendants, and concern different drugs; the relevant document sets will therefore differ.

<sup>4</sup> In the event parties have already made document productions pursuant to Document Production Orders entered by a different court, as has occurred in the Propranolol cases that had been pending in the Southern District of New York, in order to promote efficiency, document production in those cases should be governed by the same standards set out in those orders. Once Plaintiffs’ leadership is settled, the parties can meet and confer on this issue at the appropriate time.

(ECF No.194), and Pretrial Order No. 13 (ECF No. 196), Defendants have conferred, reached consensus, and respectfully request the expansion of Defendants' liaison counsel to include representatives from each individual drug case. The following counsel and firms, who collectively represent at least one Defendant in each of the individual drug cases, can act as a defense liaison group for coordination with the Court and for administrative purposes for any global case-issues.

- **Jan P. Levine**, Pepper Hamilton LLP. Ms. Levine currently serves as Defendants' liaison counsel pursuant to the Court's Pretrial Order No. 3 (ECF No. 37). Defendants respectfully request that Ms. Levine continue to serve in her current role as Defendants' liaison counsel.
- **Chul Pak**, Wilson Sonsini Goodrich & Rosati PC. Mr. Pak has represented defendants in numerous multi-district antitrust class action cases, including *In re Capacitors Antitrust Litigation* (N.D. Cal., 14-cv-03264-JD), *In re SRAM Antitrust Litigation* (N.D. Cal., M:07-cv-01819-CW) and *In re Photochromic Lens Antitrust Litigation* (M.D. Fl., 8:10-md-2173-JDW-EAJ). Mr. Pak's curriculum vitae is attached as Exhibit 1 for the Court's consideration.
- **Sheron Korpus**, Kasowitz Benson Torres LLP. Mr. Korpus has represented defendants in significant multi-district antitrust class actions, including *Behrend v. Comcast Corp.* (E.D. Pa., 03-6604), *Kristian v. Comcast* (D. Mass., 03-12466-EFH), *In re Air Cargo Shipping Services Antitrust Litig.* (E.D.N.Y., 06-MD-1775 (JG)(VVP), and *In re Transpacific Passenger Air Transport Antitrust Litig.* (N.D. Cal., No. C 07-05634 CRB). Mr. Korpus' curriculum vitae is attached as Exhibit 2 for the Court's consideration.

- **Saul P. Morgenstern** and **Laura S. Shores**, Arnold & Porter Kaye Scholer LLP. **Mr. Morgenstern** has represented defendants in a number of antitrust and pharmaceutical multi-district and multi-jurisdictional litigations, including *In re Skelaxin (Metaxalone) Antitrust Litigation* (E.D. Tenn., MDL 2343), *In re Rail Fuel Surcharge Antitrust Litigation* (D.D.C., MDL 1869), *In re Pharmaceutical Industry Average Wholesale Price Litigation* (D. Mass., MDL 1456), *In re Compensation of Managerial, Professional and Technical Employees Antitrust Litigation* (D.N.J. MDL 1471), and *In re Brand Name Prescription Drug Antitrust Litigation* (N.D. Illinois, MDL 997), along with related state actions, and has served on joint defense steering committees and as defense liaison counsel in several such matters. **Ms. Shores** has also represented pharmaceutical clients in consolidated and multi-district class actions brought under federal and state antitrust laws. In addition to *In re Brand Name Prescription Drug Antitrust Litigation* (MDL 997), these include *In re Lamictal Antitrust Litigation* (D.N.J. 2012), and *In re K-Dur Antitrust Litigation* (D.N.J., MDL 1419). Mr. Morgenstern's and Ms. Shores curriculum vitae are attached as Exhibit 3 for the Court's consideration.

Dated: April 28, 2017

Respectfully submitted,

By: /s/ Jan P. Levine

Jan P. Levine  
Robin Sumner  
Michael Hartman  
PEPPER HAMILTON LLP  
3000 Two Logan Square  
Eighteenth & Arch Streets  
Philadelphia, PA 19103-2799  
Tel: (215) 981-4000  
Fax: (215) 981-4750  
levinej@pepperlaw.com  
sumnerr@pepperlaw.com  
hartmanm@pepperlaw.com

Keith J. Harrison  
Shari Ross Lahlou  
Astor H.L. Heaven  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, NW  
Washington, D.C. 20004-2595  
Tel. (202) 624-2500  
Fax. (202) 624-5116  
kharrison@crowell.com  
slahlou@crowell.com  
aheaven@crowell.com

*Counsel for West-Ward Pharmaceuticals Corp.*

By: /s/ Sheron Korpus

Sheron Korpus  
KASOWITZ BENSON TORRES LLP  
1633 Broadway  
New York, New York 10019  
Tel: (212) 506-1700  
Fax: (212) 506-1800  
skorpus@kasowitz.com

*Counsel for Actavis Elizabeth LLC, Pliva Inc.,  
and Teva Pharmaceuticals USA, Inc.*

By: /s/ Christopher T Holding

Christopher T. Holding

By: /s/ Chul Pak

Chul Pak  
Jonathan M. Jacobson  
Michael S. Sommer  
Jeffrey C. Bank  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
1301 Avenue of the Americas, 40th Fl.  
New York, NY 10019  
Tel: (212) 999-5800  
Fax: (212) 999-5899  
cpak@wsgr.com  
jjacobson@wsgr.com  
msommer@wsgr.com  
jbank@wsgr.com

*Counsel for Mylan Inc., Mylan  
Pharmaceuticals Inc. and UDL Laboratories  
Inc.*

By: /s/ Saul P. Morgenstern

Saul P. Morgenstern  
Margaret A. Rogers  
ARNOLD & PORTER KAYE SCHOLER  
LLP  
250 W. 55th Street  
New York, NY 10019  
Tel: (212) 836-8000  
Fax: (212) 836-8689  
saul.morgenstern@apks.com  
margaret.rogers@apks.com

Laura S. Shores  
ARNOLD & PORTER KAYE SCHOLER  
LLP  
601 Massachusetts Avenue  
Washington, DC 20001  
Tel: (202) 942-5000  
Fax: (202) 942-5999  
laura.shores@apks.com

*Counsel for Sandoz Inc. and Fougera*



GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, Massachusetts 02210  
Tel.: (617) 570-1679  
Fax: (617) 523-1231  
cholding@goodwinlaw.com

*Counsel for Actavis Holdco U.S., Inc. and Teva  
Pharmaceuticals USA, Inc.*

By: /s/ Jan P. Levine  
Jan P. Levine  
Robin Sumner  
Michael Hartman  
PEPPER HAMILTON LLP  
3000 Two Logan Square  
Eighteenth & Arch Streets  
Philadelphia, PA 19103-2799  
Tel: (215) 981-4000  
Fax: (215) 981-4750  
levinej@pepperlaw.com  
sumnerr@pepperlaw.com  
hartmanm@pepperlaw.com

*Counsel for Actavis Holdco U.S., Inc. and Teva  
Pharmaceuticals USA, Inc.*

By: /s D. Jarrett Arp  
D. Jarrett Arp  
Daniel W. Nelson  
Melanie L. Katsur  
Jason R. Meltzer  
Christopher B. Leach  
GIBSON, DUNN & CRUTCHER, LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Tel: (202) 955-8500  
Fax: (202) 467-0539  
jarp@gibsondunn.com  
dnelson@gibsondunn.com  
mkatsur@gibsondunn.com  
jmeltzer@gibsondunn.com  
cleach@gibsondunn.com

*Counsel for Heritage Pharmaceuticals Inc.*

*Pharmaceuticals Inc.*

By: /s Stacey Anne Mahoney  
Stacey Anne Mahoney  
MORGAN, LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, New York 10178  
Tel: (212) 309-6000  
Fax: (212) 309-6001  
stacey.mahoney@morganlewis.com

*Counsel for Breckenridge Pharmaceutical, Inc.*

By: /s Steven A. Reed  
Steven A. Reed  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, Pennsylvania 19103  
Tel: (215) 963-5000  
Fax: (215) 963-5001  
steven.reed@morganlewis.com

*Counsel for Glenmark Pharmaceuticals Inc.,  
USA*

By: /s Scott A. Stempel  
Scott A. Stempel  
J. Clayton Everett, Jr.  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave., NW  
Washington, D.C. 20004-2541  
Tel: (202) 739-3000  
Fax: (202) 739-3001  
scott.stempel@morganlewis.com  
clay.everett@morganlewis.com

*Counsel for Perrigo New York, Inc. and  
Perrigo Company*

By: /s/ John E. Schmidlein  
John E. Schmidlein  
Sarah F. Teich  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
Tel: (202) 434-5000

By: /s/ Devora W. Allon

Devora W. Allon  
Jay P. Lefkowitz  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-4970  
devora.allon@kirkland.com

*Counsel for Upsher-Smith Laboratories, Inc.*

By: /s/ Devora W. Allon

Devora W. Allon  
Jay P. Lefkowitz  
Joseph Serino, Jr., P.C.  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-4970  
devora.allon@kirkland.com  
jay.lefkowitz@kirkland.com  
joseph.serino@kirkland.com

Douglas J. Kurtenbach  
KIRKLAND & ELLIS LLP  
3 00 North LaSalle  
Chicago, Illinois 60654  
Tel: (312) 862-2000  
Fax: (312) 862-2200  
douglas.kurtenbach@kirkland.com

*Counsel for Akorn, Inc. and Hi-Tech  
Pharmacal Co., Inc.*

Jennifer G. Levy  
Jason R. Parish  
Jacob M. Boyars  
KIRKLAND & ELLIS LLP  
655 Fifteenth Street N.W.  
Washington, D.C. 20005  
Tel: (202) 879-5000  
Fax: (202) 879-5200  
jennifer.levy@kirkland.com  
jason.parish@kirkland.com  
jacob.boyars@kirkland.com

*Counsel for Zydus Pharmaceuticals (USA),*

jschmidtlein@wc.com  
steich@wc.com

*Counsel for Par Pharmaceutical, Inc.*

By: /s/ J. Douglas Baldridge

J. Douglas Baldridge  
Lisa Jose Fales  
Danielle R. Foley  
VENABLE LLP  
600 Massachusetts Avenue, NW  
Washington, DC 20001  
Tel: (202) 344-4000  
jbaldridge@venable.com  
ljfales@venable.com  
drfoley@venable.com

Thomas J. Welling, Jr.  
VENABLE LLP  
1270 Avenue of the Americas  
24th Floor  
New York, NY 10020  
Tel: (212) 307-5500  
tjwelling@venable.com

*Counsel for Taro Pharmaceuticals U.S.A., Inc.  
and Sun Pharmaceutical Industries, Inc.*

By: /s/ Damon W Suden

Damon W. Suden  
William A. Escobar  
KELLEY DRYE & WARREN LLP  
101 Park Avenue  
New York, New York 10178  
Tel.: (212) 808-7771  
Fax: (212) 808-7897  
dsuden@kelleydrye.com  
wescobar@kelleydrye.com

*Counsel for Wockhardt USA, LLC and Morton  
Grove Pharmaceuticals, Inc.*

By: /s/ Christine C. Levin

Christine C. Levin  
DECHERT LLP

*Inc.*

Raymond A. Jacobsen, Jr.  
Paul M. Thompson  
McDermott Will & Emery LLP  
500 North Capitol Street, N.W.  
Washington, DC 20001  
Tel: 202-756-8028  
rayjacobsen@mwe.com  
pthompson@mwe.com

Nicole L. Castle  
McDermott Will & Emery LLP  
340 Madison Avenue  
New York, NY 10173  
Tel.: (212) 547-5480  
Fax: (212) 547-5444  
ncastle@mwe.com

*Counsel for Impax Laboratories, Inc.*

By: /s/ Heather K. McDevitt  
Heather K. McDevitt  
Bryan D. Gant  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Tel.: (212) 819-8200  
Fax: (212) 354-8113  
hmcdevitt@whitecase.com  
bgant@whitecase.com

*Counsel for Teligent, Inc.*

By: /s/ Gerald E. Arth  
Gerald E. Arth  
Theodore H. Jobes  
Ryan T. Becker  
FOX ROTHSCHILD LLP  
2000 Market Street, 20th Floor  
Philadelphia, PA 19103  
Tel: (215) 299-2000  
Fax: (215) 299-2150  
garth@foxrothschild.com  
tjobes@foxrothschild.com  
rbecker@foxrothschild.com

Cira Centre  
2929 Arch St  
Philadelphia, PA 19104  
Tel: (215) 994-4000  
christine.levin@dechert.com

*Counsel for Citron Pharma, LLC*

By: /s/ Michael Martinez  
Michael Martinez  
Steven Kowal  
Lauren Norris Donahue  
Brian J. Smith  
K& L GATES LLP  
70 W. Madison Street, Suite 3100  
Chicago, IL 60602  
Tel: (312) 372-1121  
Fax: (312) 872-8000  
michael.martinez@klgates.com  
steven.kowal@klgates.com  
lauren.donahue@klgates.com  
brian.j.smith@klgates.com

*Counsel for Mayne Pharma Inc.*

By: /s/ Brian T. Feeney  
Brian T. Feeney  
GREENBERG TRAURIG, LLP  
1700 Two Commerce Square  
2001 Market Street  
Philadelphia, PA 19103  
Tel: (215) 988-7812  
Fax: (215) 717-5265  
feeneyb@gtlaw.com

Roger B. Kaplan  
GREENBERG TRAURIG, LLP  
500 Campus Drive, Suite 400  
Florham Park, NJ 07932-0677  
Tel: (973) 360-7957  
Fax: (973) 295-1257  
kaplanr@gtlaw.com

James I. Serota  
GREENBERG TRAURIG, LLP  
MetLife Building

By: /s/ George G. Gordon

George G. Gordon  
Stephen D. Brown  
Julia Chapman  
Christopher Trueax  
DECHERT LLP  
2929 Arch Street  
Philadelphia, PA 19104-2808  
Tel: (215) 994-2000  
Fax: (215) 994-2222  
george.gordon@dechert.com  
stephen.brown@dechert.com  
julia.chapman@dechert.com  
christopher.trueax@dechert.com

*Counsel for Lannett Company, Inc.*

By: /s/ James W. Matthews

James W. Matthews  
Katy E. Koski  
Joseph H. Jolly  
FOLEY & LARDNER LLP  
111 Huntington Avenue  
Boston, MA 02199  
Tel: (617) 342-4000  
Fax: (617) 342-4001  
jmatthews@foley.com  
kkoski@foley.com  
jjfoley@foley.com

By: /s/ Terry M. Henry

Terry M. Henry  
Melanie S. Carter  
BLANK ROME LLP  
One Logan Square 130 North 18th Street  
Philadelphia, PA 19103-6998  
Tel: (215) 569-5500  
Fax: (215) 569-5555  
thenry@blankrome.com  
mcarter@blankrome.com

*Counsel for Apotex Corp.*

By: /s/ Seth A. Goldberg

Wayne A. Mack

200 Park Avenue  
New York, NY 10166  
Tel: (212) 801-2277  
Fax: (212) 224-6155  
serotaj@gtlaw.com

*Counsel for Dr. Reddy's Laboratories, Inc.*

By: /s/ Jeffrey D. Smith

Jeffrey D. Smith  
DECOTIIS, FITZPATRICK, COLE &  
GIBLIN, LLP  
500 Frank W. Burr Blvd., Suite 31  
Teaneck, NJ 07666  
Tel: (201) 928-1100

*Counsel for Epic Pharma, LLC*

By: /s/ Leiv Blad

Leiv H. Blad  
Zarema A. Jaramillo  
LOWENSTEIN SANDLER LLP  
2200 Pennsylvania Avenue, NW  
Washington, DC 20037  
Tel: (202) 753-3800  
Fax: (202) 753-3838  
lblad@lowenstein.com  
zjaramillo@lowenstein.com

Katie R. Glynn  
LOWENSTEIN SANDLER LLP  
390 Lytton Avenue  
Palo Alto, CA 94301  
Tel: (202) 753-3824  
Fax: (202) 753-3838  
kglynn@lowenstein.com

*Counsel for Lupin Pharmaceuticals, Inc.*

By: /s/ Bobby S. Burchfield

Bobby S. Burchfield  
Brian R. Meiners  
Lauren A. Warner  
Christopher C. Yook  
KING & SPALDING LLP  
1700 Pennsylvania Avenue NW, Suite 200

Seth A. Goldberg  
DUANE MORRIS LLP  
30 South 17th St.  
Philadelphia, PA 19103  
Tel: (215) 979-1175  
Fax: (215) 689-4923  
wamack@duanemorris.com  
sagoldberg@duanemorris.com

*Counsel for Aurobindo Pharma USA, Inc.*

Washington, DC 20006  
Tel: (202) 626-5524  
Fax: (202) 626-3737  
bburchfield@kslaw.com  
bmeiners@kslaw.com  
lwarner@kslaw.com  
cyook@kslaw.com

*Counsel for Rouses Point Pharmaceuticals,  
LLC*